

### REMARKS

Claims 1-4 and 6-20 remain pending. Claim 1 is amended to specify that the substrate is that of a vehicle or vehicle part as disclosed at least in paragraphs 4, 10, 18, and 20 which is immersed as disclosed at least in paragraphs 4 and 18 and shown in Fig. 2, and a further step of applying a coating as disclosed at least in paragraphs 4, 18, 19, , and 23 and shown in Fig. 1. Claim 5 is cancelled. Claims 6-7 and 9 have been amended to conform to amended claim 1.

#### Rejection Under 35 U.S.C. § 102(b) over Gernon et al.

Claims 1, 2, 10, and 15 have been rejected as anticipated by Gernon et al., U.S. Patent No. 6,187,169 B1. Applicants respectfully traverse the rejection with respect to the amended claims.

The claims are patentable over the Gernon patent because the Gernon patent does not disclose at least the claimed features of immersing the vehicle or vehicle part substrate surface having adhered metal particle matter in an electrolyte medium and applying a coating to the cleaned surface. Instead, the Gernon patent at most teaches immersing a stainless steel electrode that has no particulate metal matter adhered—the passage in column 9 deals with metal deposited after immersion. No coating step of a cleaned surface is described.

Applicants believe the claims are not anticipated by the Gernon patent for these reasons. Reconsideration of the claims and withdrawal of the rejection are respectfully requested.

#### Rejection Under 35 U.S.C. § 103(a) over Gernon et al.

Claims 1-13, 17, 19, and 20 have been rejected as unpatentable over Gernon et al., U.S. Patent No. 6,187,169 B1. Applicants respectfully traverse the rejection with respect to the

amended claims.

As discussed above, the Gernon patent does not teach aspects of underlying independent claim, and thus of these dependent claims. Nothing in the Gernon patent, which concerns recovery of organosulfonic acids from salts, would suggest the subject matter of the present claims, and there would be no reason to discard the purpose of the Gernon patent to turn instead to a method of cleaning and coating a substrate that has metal contaminants.

Reconsideration of the claims and withdrawal of the rejection are respectfully requested.

Rejection Under 35 U.S.C. § 103(a) over Polan et al. or Polan et al with Gernon et al.

Claims 1, 2, 4-10, 14, 15, and 17-20 have been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431 alone or with the Gernon patent. Applicants respectfully traverse the rejection with respect to the amended claims.

First, the Gernon patent is nonanalogous art, as it is not in the field of coating metal substrates and is not directed to the problem Applicants sought to solve of cleaning metal contaminants from a substrate prior to cleaning.

Even were the Gernon reference analogous art, however, the combined references still fail to teach or suggest a method of cleaning adhered metal particles from a surface of a conductive vehicle or vehicle part substrate by immersing it in an electrolyte medium. The combined references further fail to teach or suggest then coating the claimed vehicle or vehicle part substrate. The Polan patent does not concern removing adhered metal particle matter, while the passage in the Gernon patent on which the Office Action relies suggests at most using a stainless steel anode so that metal deposited from an electrolyte will not adhere in the first place.

Further, the Polan patent metal foil would not appear to have metal particle matter on its

surface. Polan describes a process of electrolytic cleaning to remove “residual grease, oil and other contaminants” in column 5. The electrolytic cleaning technique is said to “enhance the solvent action of the caustic [cleaning] solution” by the agitation produced by the hydrogen bubbles. Col. 5, lines 14-18. The Polan patent again equates cleaning with degreasing at the end of that paragraph. *Id.* at line 23. Again, in column 4, lines 60-61 and again at line 68, Polan teaches that it is bulk oil and grease that is removed in the cleaning step. In addition, the only source Polan mentions for its particulate filtered from its replenishment system is “from the atmosphere.” Col. 1, line 23; col. 12, line 50; col. 14, lines 5-6. Nor do the Polan and Gernon patents mention or suggest in any way immersing and cleaning a vehicle or vehicle part with adhered metal particle matter.

Finally, the combined references do not suggest coating after cleaning.

For each of these reasons, the present claims are patentable over the cited art. Therefore, reconsideration of the claims and withdrawal of the rejection are respectfully requested.

Rejections Under 35 U.S.C. § 103(a) over Polan et al. alone or with Gernon et al. in View of Lauke and in View of Sallo et al. or Smith

Claim 3 has been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431 alone or with Gernon et al., U.S. Patent No. 6,187,169 B1 in view of Lauke, U.S. Patent No. 4,568,438.

Claims 11-13 and 16 have been rejected as unpatentable over Polan et al., U.S. Patent No. 4,568,431 alone or with Gernon et al., U.S. Patent No. 6,187,169 B1 in view of Sallo et al., U.S. Patent No. 3,668,090 or Smith, U.S. Patent No. 4,270,986.

Applicants respectfully traverse these rejections and request reconsideration of the

claims.

The Lauke patent is cited as teaching an eductor. The Lauke patent does not, however, teach or suggest removing metal particle matter from a conductive substrate, and so fails to remedy or account for the deficiencies of the combination of the Polan and Gernon patents.

The Sallo and Smith patents, like the Lauke patent, do not teach or suggest removing metal particle matter from a conductive substrate, and so fails to remedy or account for the deficiencies of the combination of the Polan and Gernon patents.

Applicants, accordingly, respectfully request withdrawal of the rejections and reconsideration of the claims.

### Conclusion

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,



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